

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: JASON EDWARD LANDER and : CHAPTER 13  
MADALYN MICHELLE LANDER :  
Debtor(s) :  
 :  
CHARLES J. DEHART, III :  
STANDING CHAPTER 13 TRUSTEE :  
Movant :  
 :  
vs. :  
 :  
JASON EDWARD LANDER and :  
MADALYN MICHELLE LANDER :  
Respondent(s) : CASE NO. 1-19-bk-01985

TRUSTEE'S OBJECTION TO CHAPTER 13 PLAN

AND NOW, this 13th day of June, 2019, comes Charles J. DeHart, III, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced debtor(s)' plan for the following reason(s):

1. Debtor(s)' plan violates 11 U.S.C. Sec. 1322(a)(1) in that the debtor(s) has not submitted all or such portion of the disposable income to the Trustee as required.
2. The Trustee avers that debtor(s)' plan is not feasible based upon the following:
  - a. Insufficient Monthly Net Income as indicated on Schedules I and J.
3. Trustee avers that debtor(s)' plan is not feasible and cannot be administered due to the lack of the following:
  - a. Paystub for month ending June 30, 2019.

WHEREFORE, Trustee alleges and avers that debtor(s) plan is nonconfirmable and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of debtor(s) plan.
- b. Dismiss or convert debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

/s/Charles J. DeHart, III  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036

CERTIFICATE OF SERVICE

AND NOW, this 17th day of June, 2019, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Harrisburg, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Mark Buterbaugh, Esquire  
230 York Street  
Hanover, PA 17331

/s/Deborah A. Behney  
Office of Charles J. DeHart, III  
Standing Chapter 13 Trustee